

# **Exhibit A**

**From:** [Shen, Andrew C.](#)  
**To:** ["Flowers, Jodi";](#) [Haefele, Robert;](#) [Sean Carter,;](#) [Tarbutton, Joseph;](#) [Goldman, Jerry;](#) [Frank H. Granito,;](#) [Jeanne O'Grady,;](#) [Baumeister, Michael;](#) [Capone, Thea;](#) [Kry, Robert;](#) [Nitz, Eric;](#) [Migliori, Don](#)  
**Cc:** [Kellogg, Michael K.;](#) [Rapawy, Gregory G.](#)  
**Subject:** In re 9/11 - motions to dismiss  
**Date:** Thursday, March 30, 2023 8:28:23 AM

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Counsel:

I am writing regarding the Court's March 13, 2023 Order, which requires the parties to meet and confer regarding proposals for motions to dismiss to be filed by Saudi Arabia and Dallah Avco.

Saudi Arabia proposes the following page limits for briefing on its motion to dismiss: 50 pages for Saudi Arabia's motion to dismiss, 50 pages for Plaintiffs' opposition, and 25 pages for reply. In view of the Court's scheduling order, Saudi Arabia no longer proposes that the parties submit jurisdictional statements of facts and evidence. Saudi Arabia further proposes that any attorney declarations be limited to introducing exhibits, with no argument, summarization, or characterization of the exhibits. Evidentiary objections should be raised concisely in a table submitted together with the filing that responds to the filing where the documents were submitted. Thus, Plaintiffs' evidentiary objections to material cited in Saudi Arabia's motion to dismiss will be submitted with Plaintiffs' opposition brief. Saudi Arabia's evidentiary objections to material cited in Plaintiffs' opposition will be submitted with Saudi Arabia's reply brief. Saudi Arabia believes that Plaintiffs should file a single opposition brief. In the event the Court permits the Ashton Plaintiffs to file a separate opposition brief, all Plaintiffs should share a 50-page limit for their oppositions.

Dallah Avco proposes the following page limits for its motion to dismiss and in the alternative for summary judgment: 40 pages for Dallah Avco's motion, 40 pages for Plaintiffs' opposition, and 20 pages for reply. Because Dallah Avco will be moving for summary judgment in the alternative, it proposes to file a Rule 56.1 statement with its brief limited to 40 pages. Plaintiffs' response to that statement (including any statement of additional facts) should also be limited to 40 pages, excluding the cut and pasted portions of Dallah Avco's statement. Any attorney declarations a party submits should be limited in the manner set forth above. Evidentiary objections should also be submitted in the manner set forth above. Dallah Avco's position is that Plaintiffs should file a single opposition brief and a single response to the Rule 56.1 statement.

Please inform us of Plaintiffs' position by this Friday. We are also available for a call if Plaintiffs believe that would be productive.

Regards,

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